

Mitchell D. Cohen
Michael J. Riel
VEDDER PRICE P.C.
1633 Broadway, 47th Floor
New York, NY 10019
Telephone: 212-407-7700
Email: mcohen@vedderprice.com
mriela@vedderprice.com

Counsel to Imperial Bag & Paper Co., LLC

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re: : Chapter 11
: Case No. 15-23007 (RDD)
The Great Atlantic & Pacific Tea :
Company, Inc., *et al.* : (Jointly Administered)
Debtors. :
:-----X

**TOP 10 CREDITOR IMPERIAL BAG & PAPER CO., LLC'S
NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF DOCUMENTS**

Undersigned counsel hereby appears for **Imperial Bag & Paper Co., LLC** (“Imperial”), which holds a claim in an amount exceeding \$3.5 million and is one of the ten largest unsecured creditors in the above-captioned cases. Pursuant to Rules 2002 and 9010(b) of the Federal Rules of Bankruptcy Procedure, hereby requests that all notices given or required to be given in these cases be given to and served upon the undersigned at the mailing address and email address set forth below:

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Despite that Imperial holds a claim in an amount exceeding \$3.5 million, and is one of the ten largest unsecured creditors in these cases, the Debtors failed to include Imperial's claim in their *Consolidated List of Creditors Holding the 40 Largest Unsecured Claims* (the "Top 40 List") that was filed with The Great Atlantic & Pacific Tea Company, Inc.'s chapter 11 petition. Even after Imperial's counsel advised the Debtors' counsel of that omission, the Debtors refused to amend the Top 40 List accordingly.

Neither this Notice of Appearance nor any later appearance, pleading, claim or suit shall constitute a waiver of (a) the right to have final orders in non-core matters entered only after *de novo* review by a District Court Judge; (b) the right to trial by jury in any proceeding related to, or triable in, these cases or any case, controversy, or proceeding related to these cases; (c) the right to request the District Court to withdraw the reference in any matter subject to mandatory or discretionary withdrawal; (d) any objection to the jurisdiction of this Court for any purpose; or (e) any other rights, claims, actions, defenses, setoffs or recoupments as appropriate, in law or in equity, under any agreements, all of which rights, claims, actions, defenses, setoffs and recoupments are expressly reserved.

Dated: July 27, 2015

VEDDER PRICE P.C.

By: /s/ Michael J. Riela
Mitchell D. Cohen
Michael J. Riela
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New York, NY 10019
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Attorneys for Imperial Bag & Paper Co., LLC